

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and  
all others similarly situated,

Plaintiff,

**vs.**

NORDSEC LTD., NORDSEC B.V., NORDVPN  
S.A., NORD SECURITY INC., and TEFINCOM  
S.A. d/b/a NORDVPN,

Defendants.

**CASE NO. 3:24-CV-00277-KDB-DCK**

**DECLARATION OF GERALDAS KASULIS IN SUPPORT OF DEFENDANT  
NORD SECURITY INC.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Gerald Das Kasulis declares as follows:

1. I am the director at Nord Security Inc. I am competent to testify and make this declaration based on my personal knowledge.
2. I understand that this litigation involves claims that Nordvpn S.A. charged a customer in North Carolina for a recurring subscription to retail consumer VPN and related services, allegedly without the customer's consent. I further understand that the customer first subscribed to NordVPN and related services in August 2023.
3. Nord Security Inc. is incorporated under the laws of the state of Delaware, and its principal place of business in Lewes, Delaware. Nord Security Inc. sells and provides business-to-business services, such as NordLayer. It does not sell or provide any services to retail consumers in the United States, and it was not involved in providing any such services in or before 2023. Nord Security Inc. did not charge any retail customer in the United States, including Plaintiff, for any such services at any time, and it did not enter into any contract with Plaintiff.

4. Nord Security Inc. maintains its own funds in an independent account sufficient to operate its business.

5. Nord Security Inc. has its own bylaws.

6. Nord Security Inc. is managed by its own board and holds its own shareholder meetings, as required.

7. Nord Security Inc. accurately maintains its own business records, including financial records, minutes from shareholder meetings, corporate tax filings, and other corporate documents, such as the Certificate of Incorporation and corporate resolutions.

8. Nord Security Inc. does not share officers or directors with the other Defendants.

9. Nord Security Inc. does not have offices, contractors, or property in North Carolina.

10. Nord Security Inc. has never purchased or used advertising space or held an event of any kind in North Carolina for retail consumer VPN or related consumer services.

11. Nord Security Inc. does not ship consumer VPN and related consumer products into North Carolina.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 1st day of July, 2024.

*Geraldas Kasulis*

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Director

Geraldas Kasulis